

## **REMARKS**

This Preliminary Amendment is being submitted to support the Continued Prosecution Application concurrently filed. In response to the Final Office Action dated December 1, 1999. Applicants have amended Claims 1, 3, 5-7 and 9. Reconsideration in light of the amendment and remarks made herein is respectfully requested.

### **I. Drawings**

In the Office Action, the drawings were objected to by the Draftsperson as noted in the form PTO 948. Applicants shall postpone submission of formal drawings until the Claims have been allowed.

### **II. Rejection Under 35 U.S.C. § 102(e)**

In the Final Office Action, mailed December 1, 1999, the Examiner rejected claims 1-8 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 5,625,570 issued to Vizireanu et al. ("Vizireanu"). Claims 9 under 35 U.S.C. § 103(a) as being unpatentable over Vizireanu and claims 10-15 under 35 U.S.C. § 103(a) as being unpatentable over Vizireanu in view of U.S. Patent No. 5,273,050 issued to Schaus et al. ("Schaus"). Applicants respectfully traverse the rejections for the following reasons.

Applicants maintain the same arguments as presented in the previous response filed on September 1, 1999. In particular, Applicants maintain that Vizireanu does not disclose two processors. The Examiner states that the element 340 is a processor. However, the element 340 in Vizireanu (Figure 3) is merely a 6 channel audio server card interfacing between the processor 20 to the VCR's 310. The audio server card 340 only provides the audio signal lines to send the audio segments (Vizireanu, Col. 19, lines 40-44).



In addition, Applicants maintain that Vizireanu does not disclose a plurality of memory banks. The Examiner stated that the VCR 310 is read as a memory bank because "the function of the VCR is to store data (write) and to retrieve data (read) when being accessed." (Office Action, page 5). Applicants respectfully disagree with this overly broad interpretation of a memory bank. As is well known by the public, a VCR is a mechanical device with magnetic tape that can record audio segments. A VCR is not a memory bank. In the present invention, the memory banks include semiconductor memory devices, as opposed to magnetic tape. To provide further specificity to the claims, Applicants have amended claims 1 and 5 to recite:

"...a second plurality of memory banks of semiconductor memory devices..."

Therefore, Applicants believe that independent Claims 1, 5, and their respective dependent Claims are distinguishable over the cited prior art references. Accordingly, Applicants respectfully request the rejections under 35 U.S.C. § 102(e) and 35 U.S.C. § 103(a) be withdrawn.

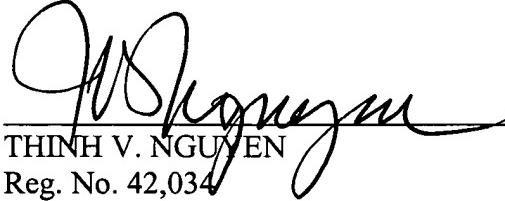


## CONCLUSION

In view of the amendments and remarks made above, it is respectfully submitted that the pending claims are in condition for allowance, and such action is respectfully solicited.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

  
THINH V. NGUYEN

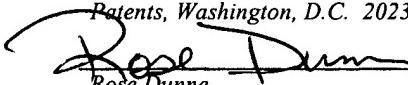
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### CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Assistant Commissioner for Patents, Washington, D.C. 20231 on: March 31, 2000.

  
Rose Dunne

03/31/00  
Date

